

DECLARATION OF [REDACTED]

[REDACTED], pursuant to 28 U.S.C. § 1746, and subject to the penalties of perjury declares as follows:

1. My name is [REDACTED]. I am more than twenty-one years old, competent to testify, and have no legal or mental disability and have personal knowledge of the facts stated herein. I freely give this declaration for use in this case. This declaration was executed in the state of Georgia, where I am a resident.
2. I was trafficked for sex and later worked as a sex worker at the Americas Best Value Inn located at 2574 Candler Road, Decatur, Georgia, 30032 (“ABVI”) from 2013 to about 2015. I lived at the motel for over a year in the beginning and later would stay for a few months at a time.
3. When I first got to the ABVI, I was being trafficked by a pimp when I was 19 years old. He was arrested several months later. After he was arrested, I continued to work as a sex worker at the motel.
4. I mostly stayed in rooms 120 and 221 at the motel. When I was trafficked and independent, I would see between 5–10 men for sex each day at the ABVI.
5. Housekeeping cleaned my room and regularly saw evidence of the sex work, like the trash can with a lot of condoms, drugs out in the room, lingerie and lubricant in the room.

6. There was a lot of prostitution and sex trafficking when I was at the ABVI. It was very blatant. I saw men and women argue outside the rooms, girls fighting with each other on the property, and fights where the windows would get busted out. I was robbed twice while I was there, once in 2013 when a girl and two men forced their way into my room and took my belongings. I left the room in my underwear and ran to the office beaten and bruised and asked Mr. Patel to call the police. Mr. Patel watched the surveillance video of the three people robbing me and leaving the room. After they left, Mr. Patel would not call the police and told me to go back to my room.
7. The owners and the employees knew everything that was going on at the ABVI. Mr. Patel and his wife both asked the people staying at the motel lots of personal questions. Early on Mr. Patel and I talked about the fact that I was a sex worker at the motel and he said because I was selling sex there, he wanted to move me to the back of the building. So he did. The front side of the motel looked a little nicer. The “regular” guests would be in the front of the motel and the guests who were drug dealers, or being sold for sex would be put in the back.
8. Mr. Patel would ask lots of questions about the sex business at the motel. He would frequently ask about the type of men we would see, wanted to know how

many men we saw a day and how much money they gave us. On nights when I did not see dates, Mr. Patel let me know he was watching me and would tell me, “You didn’t have company last night?” “Company” meant men coming to buy sex at the motel.

9. Sometimes when I was late with rent money, Mrs. Patel would ask me “When will you have company,” and I would tell her in 20 minutes or so I would have a date. So she would wait until after that and let me pay my rent late.
10. I had a trans friend who was also selling sex at the motel who had sex with Mr. Patel.
11. The motel tried to keep the police off the property because of all the illegal activity at the ABVI. The police would sometimes drive through and park on the edge of the property. Mr. Patel would go to the patrol cars and tell the police that they had to leave. Mr. Patel would not let them watch the property from the parking lot. So the police had to try to watch the property from the street but from there they could only see the front side of the motel.
12. I would get stopped by the police when I walked down the street. Frequently police officers would stop me and tell me that they knew what was going on at the motel and if they caught me I would be arrested.

13. When I was at the ABVI, there were 10 or more other people being sold for sex at the motel. They would walk the property to pick up dates.
14. When I was at the ABVI, there were at least 50–100 men who came to the property each day and would honk their horns and girls would come out of their rooms dressed skimpy so the man could pick out which girl he wanted to buy for sex. The man would choose the girl and then walk up to her room. It was like a drive-through sex operation.
15. The employees could see everything that was going on because they sat right in front of a large flat screen TV that showed the video surveillance from around the motel.
16. I have read this Declaration consisting of 16 numbered paragraphs and I declare under penalty of perjury that it is true and correct.
- Executed on May 13, 2025.

